



Recd.
Rec. Mgmt.
July 19, 2000

Department of Energy

Ohio Field Office
West Valley Demonstration Project
10282 Rock Springs Road
West Valley, NY 14171-9799

DW:2000:0534

July 17, 2000

Mr. Robert R. Campbell, President
West Valley Nuclear Services Company
10282 Rock Springs Road
West Valley, NY 14171-9799

ATTENTION: J. R. Gerber, Environmental Affairs Manager, AOC-24

SUBJECT: Environmental Checklist OH-WVDP-2000-01, "Site-wide Routine Maintenance Activities"

REFERENCE: WD:2000:0499 (72781), J. R. Gerber to E. A. Lowes, "Environmental Checklist OH-WVDP-2000-01, 'Site-wide Routine Maintenance Activities,'" dated July 7, 2000

Dear Sir:

The Ohio Field Office West Valley Demonstration Project National Environmental Policy Act (NEPA) Compliance Officer has reviewed the subject environmental checklist and agrees that the routine maintenance activities described therein are categorically excluded per Title 10, Code of Federal Regulations Part 1021, Appendix B to Subpart D, CX B1.3, "Routine maintenance/custodial services for building, structures, infrastructures, and equipment." Enclosed is a signed Environmental Checklist/Action Description Memorandum Form.

If you have any questions, please contact me on Extension 4016.

Sincerely,

A handwritten signature in black ink, reading "Daniel W. Sullivan".

Daniel W. Sullivan
NEPA Compliance Officer

Enclosure: Environmental Checklist/Action Description Memorandum

DWS:0100 - 72802 - 451.7

DWS/bma

Department of Energy (DOE)
Ohio Field Office, West Valley Demonstration Project (OH/WVDP)

ENVIRONMENTAL CHECKLIST

Project/Activity Title: Site-wide Routine Maintenance Activities	NEPA ID Number: OH-WVDP-2000-01	Rev. #: 0	Date: 07/07/00
Contractor Project Manager: John R. Gerber	Phone Number: (716) 942-4885		
Contractor NEPA Coordinator: Charlotte Banzer	Phone Number: (716) 942-4109		
OH/WVDP NEPA Document Manager: Daniel W. Sullivan	Phone Number: (716) 942-4016		

A. BRIEF PROJECT/ACTIVITY DESCRIPTION: Attach a detailed description or statement of work.

B. SOURCES OF IMPACT: Would the action involve, generate, or result in changes to any of the following?

	YES	NO		YES	NO
1. Air Emissions	X		12. Water Use/Diversion	X	
2. Liquid Effluents	X		13. Water Treatment	X	
3. Solid Waste	X		14. Water Course Modification		X
4. Radioactive Waste/Soil	X		15. Radiation/Toxic Chemical Exposures	X	
5. Hazardous Waste	X		16. Pesticide/Herbicide Use	X	
6. Mixed Waste	X		17. High Energy Source/Explosives		X
7. Chemical Storage/Use	X		18. Transportation		X
8. Petroleum Storage/Use	X		19. Noise Level	X	
9. Asbestos	X		20. Workforce Adjustment	X	
10. Utilities	X		21. Other		X
11. Clearing or Excavation	X				

In an attachment, qualify and explain each question that you have specifically answered "YES."

C. CATEGORY EVALUATION CRITERIA: Would the proposed action:

	YES	NO
1. Take place in an area of previous or ongoing disturbance?	X	
2. Create hazardous, radioactive or mixed waste for which no disposal is available?		X
3. Impact a RCRA-regulated unit or facility?		X
4. Force a low income or ethnic minority population to shoulder a disproportionate share of the negative environmental impacts of pollution or environmental hazards because of a lack of political or economic strength?		X
5. Involve air emissions and be located in an air pollutant non-attainment or maintenance area for any criteria pollutants?		X
6. Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including DOE and/or Executive Orders? (i.e., require any federal, state or local permits, approvals, etc.)?		X
7. Disturb hazardous substances, pollutants or contaminants that pre-exist in the environment such that there would be uncontrolled or unpermitted releases?		X
8. Require siting, construction, or major expansion of a waste storage, disposal, recovery, or treatment facilities, but may include such categorically-excluded facilities?		X
9. Adversely affect environmentally sensitive resources including, but not limited to: structures of archeological, historic or architectural significance; threatened or endangered species or their habitat; floodplains or wetlands; wildlife refuges, agricultural lands or vital water resources(e.g., sole-source aquifers)?		X
10. Involve extraordinary circumstances? As specified at 10 CFR § 1021.410(b)(2), extraordinary circumstances are unique situations presented by specific proposed actions, such as scientific controversy about the environmental effects of the action, uncertain effects or effects involving unique or unknown risks, or unresolved conflicts concerning alternate uses of available resources within the meaning of Section 102(2)(E) of NEPA [42 U.S.C. 4332(2)].		X
11. Be "connected" to other actions with potentially significant impacts, related to other proposed actions with cumulatively significant impacts, and precluded by 40 CFR § 1506.1 or 10 CFR § 1021.211?		X

In an attachment, qualify and explain each question that you have specifically answered "YES."

U.S. Department of Energy (DOE)
Ohio Field Office, West Valley Demonstration Project (OH/WVDP)

ENVIRONMENTAL CHECKLIST

D. RECOMMENDATION AND DETERMINATION

DOE OH/WVDP Director's Recommendation: I find and recommend that this proposed action meets the criteria specified in 10 CFR § 1021, Subpart D, and/or DOE Policy and Guidance for the following:

- ☒ Categorical Exclusions (Appendix B, Class of Action B1.3)
- ☐ Actions Within the Scope of Existing NEPA Documentation
(NEPA Document ID Number _____)
- ☐ On-going Operations (Standard Operating Procedure OH-6.1.01, Rev. 1, Section 5.2)

Signature: Elizabeth Jones for Date 7/17/2000
Director, Ohio Field Office,
West Valley Demonstration Project (OH/WVDP),
Department of Energy

DOE OH/WVDP NEPA Compliance Officer's Determination: Based on my review of the attached information concerning this proposed action, as the OH/WVDP NEPA Compliance Officer (DOE Order 451.1A, Section 5.d.), I have determined that the proposed action fits within the specified class of actions, that the other regulatory requirements identified in Section C are met, and that this proposed action proceed without further NEPA review.

Signature: Doniella Sells Date 7/11/2000
OH/WVDP NEPA Compliance Officer,
West Valley Demonstration Project

OR

- ☐ Environmental Assessments (Appendix C, Class of Action _____; or Action not listed in Subpart D)
- ☐ Environmental Impact Statements (Appendix D, Class of Action _____)
- ☐ Interim Actions (40 CFR § 1506.1 and 10 CFR § 1021.211)
- ☐ Integrated Documentation for CERCLA/RCRA Actions
- ☐ Variances (Emergency Action, 40 CFR § 1506.11 and 10 CFR § 1021.343)

DOE-OH NEPA Compliance Officer's Concurrence: I concur with the recommendation that this proposed action fits within the specified class of actions.

Signature: _____ Date _____
NEPA Compliance Officer,
Ohio Field Office,
Department of Energy

DOE-OH Manager's Determination: Based on my review of the attached information concerning this proposed action, as the Head of the Ohio Field Office (DOE Order 451.1A, Section 5.a.), I have determined that the level of documentation recommended for the proposed action is appropriate.

Signature: _____ Date _____
Manager, Ohio Field Office,
Department of Energy

DW:2000:0534

C. B. Banzer	AOC-24
J. R. Gerber	AOC-24
B. F. Heim	AOC-24
J. J. Hoch	AOC-24
E. D. Savage	AOC- 05



Westinghouse

Government Services Group

WEST VALLEY NUCLEAR SERVICES COMPANY

10282 ROCK SPRINGS ROAD
WEST VALLEY, NEW YORK 14171-9799
PHONE: (716) 942-4885 / FAX: (716) 942-4651

Elizabeth A. Lowes, Acting Director
U. S. Department of Energy
West Valley Demonstration Project
10282 Rock Springs Road
West Valley, NY 14171-9799

AOC-24
WD:2000:0499
July 7, 2000

ATTENTION: D. W. Sullivan

Dear Ms. Lowes:

SUBJECT: Environmental Checklist OH-WVDP-2000-01, "Site-wide Routine Maintenance Activities"

- REFERENCES:
- 1) WV-986, West Valley Nuclear Services Company, "Environmental Review Program," Revision 10, dated December 22, 1999
 - 2) Letter DW:1999:0070, D. W. Sullivan to R. R. Campbell, "Environmental Checklist OH-WVDP-98-17, West Valley Demonstration Project (WVDP) 1999 Routine Maintenance Activities," dated February 3, 1999
 - 3) OH-6.1.01, U.S. Department of Energy, Ohio Field Office, Standard Operating Procedure, "National Environmental Policy Act Compliance," Revision 1, dated July 7, 1995

Attached for your review is Environmental Checklist OH-WVDP-2000-01, "Site-wide Routine Maintenance Activities" (Attachment A). The checklist has undergone environmental review in accordance with the West Valley Nuclear Services Company (WVNS) Environmental Review Program (Reference 1).

The proposed action evaluated in this checklist involves performing routine maintenance activities for facilities, processes, systems, and equipment at the West Valley Demonstration Project (WVDP). The WVDP currently performs routine maintenance under a generic environmental checklist (Reference 2). The U.S. Department of Energy, Ohio Field Office, National Environmental Policy Act Implementing Procedure provides that generic environmental checklists should generally be updated on an annual basis (Subsection 5.2(c), Reference 3). Approval of the attached checklist would be for performing routine maintenance activities for the remainder of calendar year (CY) 2000 and through the end of CY 2001. The next update is projected for the end of CY 2001 for the period beginning CY 2002.

A categorical exclusion (CX) is recommended for the proposed action. Routine maintenance of WVDP facilities, processes, systems, and equipment falls within the class of actions described in Title 10, Code of Federal Regulations (CFR) Part 1021, as Amended, Subpart D, Appendix B, CX B1.3, "Routine maintenance/custodial services for buildings, structures, infrastructures, equipment."

If you concur with this recommendation, please sign the attached Environmental Checklist, Section *D. RECOMMENDATION AND DETERMINATION*. If you have any comments or questions regarding the checklist, please contact Charlotte Banzer of my staff at extension 4109.

Very Truly Yours,

WEST VALLEY NUCLEAR SERVICES COMPANY

Signature on File in Records Management

J. R. Gerber, Manager
Environmental Affairs

IB:2000:0166

JRG:CBB:bnm

Attachment: Environmental Checklist OH-WVDP-2000-01, "Site-wide Routine Maintenance Activities" (21 Pages)

IB:2000:0166

WD:2000:0499

bcc:	C. B. Banzer	AOC-24
	J. R. Gerber	AOC- 24
	B. F. Heim	AOC-24
	J. J. Hoch	AOC-24
	E. D. Savage	AOC- 05
	EA File # 13.1	AOC- 24
	IB Letter Log	AOC- 24

Department of Energy (DOE)
Ohio Field Office, West Valley Demonstration Project (OH/WVDP)

ENVIRONMENTAL CHECKLIST

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A. BRIEF PROJECT/ACTIVITY DESCRIPTION: Attach a detailed description or statement of work.

B. SOURCES OF IMPACT: Would the action involve, generate, or result in changes to any of the following?

	YES	NO		YES	NO
1. Air Emissions	X		12. Water Use/Diversion	X	
2. Liquid Effluents	X		13. Water Treatment	X	
3. Solid Waste	X		14. Water Course Modification		X
4. Radioactive Waste/Soil	X		15. Radiation/Toxic Chemical Exposures	X	
5. Hazardous Waste	X		16. Pesticide/Herbicide Use	X	
6. Mixed Waste	X		17. High Energy Source/Explosives		X
7. Chemical Storage/Use	X		18. Transportation		X
8. Petroleum Storage/Use	X		19. Noise Level	X	
9. Asbestos	X		20. Workforce Adjustment	X	
10. Utilities	X		21. Other		X
11. Clearing or Excavation	X				

In an attachment, qualify and explain each question that you have specifically answered "YES."

C. CATEGORY EVALUATION CRITERIA: Would the proposed action:

	YES	NO
1. Take place in an area of previous or ongoing disturbance?	X	
2. Create hazardous, radioactive or mixed waste for which no disposal is available?		X
3. Impact a RCRA-regulated unit or facility?		X
4. Force a low income or ethnic minority population to shoulder a disproportionate share of the negative environmental impacts of pollution or environmental hazards because of a lack of political or economic strength?		X
5. Involve air emissions and be located in an air pollutant non-attainment or maintenance area for any criteria pollutants?		X
6. Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including DOE and/or Executive Orders? (i.e., require any federal, state or local permits, approvals, etc.)?		X
7. Disturb hazardous substances, pollutants or contaminants that pre-exist in the environment such that there would be uncontrolled or unpermitted releases?		X
8. Require siting, construction, or major expansion of a waste storage, disposal, recovery, or treatment facilities, but may include such categorically-excluded facilities?		X
9. Adversely affect environmentally sensitive resources including, but not limited to: structures of archeological, historic or architectural significance; threatened or endangered species or their habitat; floodplains or wetlands; wildlife refuges, agricultural lands or vital water resources(e.g., sole-source aquifers)?		X
10. Involve extraordinary circumstances? As specified at 10 CFR § 1021.410(b)(2), extraordinary circumstances are unique situations presented by specific proposed actions, such as scientific controversy about the environmental effects of the action, uncertain effects or effects involving unique or unknown risks, or unresolved conflicts concerning alternate uses of available resources within the meaning of Section 102(2)(E) of NEPA [42 U.S.C. 4332(2)].		X
11. Be "connected" to other actions with potentially significant impacts, related to other proposed actions with cumulatively significant impacts, and precluded by 40 CFR § 1506.1 or 10 CFR § 1021.211?		X

In an attachment, qualify and explain each question that you have specifically answered "YES."

U.S. Department of Energy (DOE)
Ohio Field Office, West Valley Demonstration Project (OH/WVDP)

ENVIRONMENTAL CHECKLIST

D. RECOMMENDATION AND DETERMINATION

DOE OH/WVDP Director's Recommendation: I find and recommend that this proposed action meets the criteria specified in 10 CFR § 1021, Subpart D, and/or DOE Policy and Guidance for the following:

- ☒ [X] Categorical Exclusions (Appendix B, Class of Action B1.3)
- ☐ [] Actions Within the Scope of Existing NEPA Documentation
(NEPA Document ID Number _____)
- ☐ [] On-going Operations (Standard Operating Procedure OH-6.1.01, Rev. 1, Section 5.2)

Signature: _____ Date _____
Director, Ohio Field Office,
West Valley Demonstration Project (OH/WVDP),
Department of Energy

DOE OH/WVDP NEPA Compliance Officer's Determination: Based on my review of the attached information concerning this proposed action, as the OH/WVDP NEPA Compliance Officer (DOE Order 451.1A, Section 5.d.), I have determined that the proposed action fits within the specified class of actions, that the other regulatory requirements identified in Section C are met, and that this proposed action proceed without further NEPA review.

Signature: _____ Date _____
OH/WVDP NEPA Compliance Officer,
West Valley Demonstration Project

OR

- ☐ [] Environmental Assessments (Appendix C, Class of Action _____; or Action not listed in Subpart D)
- ☐ [] Environmental Impact Statements (Appendix D, Class of Action _____)
- ☐ [] Interim Actions (40 CFR § 1506.1 and 10 CFR § 1021.211)
- ☐ [] Integrated Documentation for CERCLA/RCRA Actions
- ☐ [] Variances (Emergency Action, 40 CFR § 1506.11 and 10 CFR § 1021.343)

DOE-OH NEPA Compliance Officer's Concurrence: I concur with the recommendation that this proposed action fits within the specified class of actions.

Signature: _____ Date _____
NEPA Compliance Officer,
Ohio Field Office,
Department of Energy

DOE-OH Manager's Determination: Based on my review of the attached information concerning this proposed action, as the Head of the Ohio Field Office (DOE Order 451.1A, Section 5.a.), I have determined that the level of documentation recommended for the proposed action is appropriate.

Signature: _____ Date _____
Manager, Ohio Field Office,
Department of Energy

Attachment to Environmental Checklist 2000-01
Site-wide Routine Maintenance Activities

SECTION A. BRIEF PROJECT/ACTIVITY DESCRIPTION:

BACKGROUND

From 1966 to 1972, Nuclear Fuel Services, Inc. (NFS), operated a nuclear fuel reprocessing plant at the Western New York Nuclear Service Center (WNYNSC) near West Valley, New York (**Figure 1**). The plant, which reclaimed uranium and plutonium from spent nuclear fuel, generated approximately 600,000 gallons of liquid high-level radioactive waste (HLW), which was stored in underground tanks.

In 1980, Congress passed the West Valley Demonstration Project (WVDP) Act, which directed the U. S. Department of Energy (DOE) to do the following: (1) solidify the HLW at the WNYNSC in a form suitable for transportation and disposal; (2) develop containers for the HLW that are suitable for permanent disposal; (3) transport the solidified HLW, in accordance with applicable provisions of law, to an appropriate Federal repository for permanent disposal; (4) in accordance with applicable licensing requirements, dispose of low-level radioactive waste (LLW) and transuranic (TRU) waste produced as a result of solidifying the HLW; and (5) decontaminate and decommission – (a) the tanks and other facilities of the WNYNSC in which the HLW solidified under the Project is stored; (b) the facilities used in the solidification of the waste; and (c) any material and hardware used in connection with the Project, in accordance with requirements that the Nuclear Regulatory Commission (NRC) prescribes (Public Law 96-368).

In 1982, a Final Environmental Impact Statement (EIS) and associated Record of Decision (ROD) were issued for the actions that DOE proposed to satisfy the first two requirements of the WVDP Act (DOE/EIS-0081). During the first phase of the WVDP, which was completed in June 1998, the HLW was immobilized in borosilicate glass through vitrification. The canisters of immobilized HLW are currently being stored on-site until DOE authorizes their removal. In 1993 and 1998, the DOE prepared Supplement Analyses of the 1982 Final EIS to re-examine on-going HLW solidification activities as well as other refinements to the actions originally evaluated in the EIS (DOE-EIS-025 and WVDP-321, respectively). As a result of both analyses, DOE concluded that no environmentally relevant or substantial changes in Project scope had occurred, that no new circumstances or relevant information existed, and that the environmental analyses performed for the 1982 EIS were still valid.

While HLW tank heel removal and vitrification remain the top priority of the DOE, the WVDP has turned its attention and shifted its resources to the remaining requirements of the WVDP Act, waste disposal and facility decontamination and decommissioning. An EIS is currently being prepared to review alternatives for satisfying these requirements (DOE/EIS-0226-D).

The WNYNSC and all the structures therein, including the area being utilized to conduct the WVDP (**Figures 1 and 2**), are the property of the state of New York and are managed by the New York State Energy Research and Development Authority (NYSERDA). The Cooperative Agreement between NYSERDA and DOE, Article IV, Section 4.08, *Operation, Maintenance and Repair*, states, "The Department shall operate and maintain the Project Premises, Project Facilities and such Additional Facilities that it uses in carrying out the Project and as may be necessary or appropriate to carry out the Project in a manner which protects public health and safety and complies with the provisions of this Agreement. As used in this Section, the term 'maintain' shall include, but not be limited to, the obligation to make all necessary and appropriate repairs, changes, alterations, and additions thereto or replacements thereof, interior and exterior, structural and non-structural, ordinary and extraordinary, foreseen and unforeseen."

In a similar manner, DOE Order 430.1A, "Life Cycle Asset Management," requires all DOE sites to establish procedures for maintaining physical assets "in a condition suitable for their intended use" and ensuring "physical asset availability for planned use and/or proper disposition" through "preventive, predictive, and corrective maintenance" (Attachment 2, Sections 2(b) and 2(c)). The Order defines maintenance as "Day-to-day work, including preventive and predictive

Attachment to Environmental Checklist 2000-01
Site-wide Routine Maintenance Activities

maintenance, that is required to maintain and preserve plant and capital equipment in a condition suitable for it to be used for its designated purpose" (Attachment 1, Section 31). Similarly, the Order defines repair as "The restoration of failed or malfunctioning equipment, system, or facility to its intended function or design condition. Repair does not result in a significant extension of the expected useful life" (Attachment 1, Section 45).

Routine maintenance activities, including custodial services, are performed at the WVDP by WVNS Maintenance Department personnel and, in some instances, by subcontractors under the direction of the WVNS Construction Projects Department.

TYPE AND SCOPE OF ACTIVITY

The proposed action evaluated in this environmental checklist involves performing preventive, predictive, and corrective maintenance (i.e., repair) activities on a routine basis for the remainder of calendar year (CY) 2000 and through the year end of CY 2001 to ensure that WVDP facilities, processes, systems and/or equipment are maintained in a condition suitable for their intended use.

Corrective maintenance involves repair and restoration of equipment or components that have failed or are malfunctioning and are not performing their intended function (WVDP-170, "*West Valley Nuclear Services Maintenance Manual*," Section 6.5.2(a)). Predictive maintenance involve periodic monitoring and diagnosis in order to forecast component degradation so that "as-needed" planned maintenance can be performed prior to equipment failure (WVDP-170, Section 6.5.2(c)). Preventive Maintenance (PM) includes periodic and planned maintenance actions taken to maintain a piece of equipment within design operating conditions and extend its life, and is performed prior to equipment failure or to prevent equipment failure (Standard Operating Procedure (SOP) 00-12, "Maintenance Department - Preventive Maintenance Program") .

Routine maintenance activities are an integral and necessary part of the day-to-day operations of the WVDP. The WVDP currently covers routine maintenance activities under a generic environmental checklist (OH-WVDP-98-17), which the WVDP typically updates annually, as recommended by the DOE Ohio Field Office (DOE-OH)[Subsection 5.2(c), SOP OH-6.1.01]. DOE-OH allows the five project sites that fall under its auspices to prepare generic environmental checklists for some categorically excludable activities, such as routine maintenance. The President's Council on Environmental Quality (CEQ) requires federal agencies to establish categorical exclusions (CXs) for categories of actions that the agencies have determined do not individually or cumulatively have a significant impact on the environment 40 CFR 1500.4(p)). Toward that end, DOE has categorically excluded the broad range of activities that routine maintenance encompasses as a single class of actions - 10 CFR § 1021, Subpart D, Appendix B — Categorical Exclusions Applicable to Specific Agency Actions, Class of Action B1.3, "Routine maintenance/ custodial services for buildings, structures, infrastructures, equipment" :

"B1.3 Routine maintenance activities and custodial services for buildings, structures, rights-of-way, infrastructures (e.g., pathways, roads, and railroads), vehicles and equipment, and localized vegetation and pest control, during which operations may be suspended and resumed. Custodial services are activities to preserve facility appearance, working conditions, and sanitation, such as cleaning, window washing, lawn mowing, trash collection, painting, and snow removal. Routine maintenance activities, corrective (that is, repair), preventive, and predictive, are required to maintain and preserve buildings, structures, infrastructures, and equipment in a condition suitable for a facility to be used for its designated purpose. Routine maintenance may result in replacement to the extent that replacement is in kind and is not a substantial upgrade or improvement. In kind replacement includes installation of new components to replace outmoded components if the replacement does not result in a significant change in the expected useful life, design capacity, or function of the facility. Routine maintenance does not include replacement of a major component that significantly extends the originally

Attachment to Environmental Checklist 2000-01
Site-wide Routine Maintenance Activities

intended useful life of a facility (for example, it does not include the replacement of a reactor vessel near the end of its useful life). Routine maintenance activities include, but are not limited to:

- (a) Repair of facility equipment, such as lathes, mills, pumps, and presses;
- (b) Door and window repair or replacement;
- (c) Wall, ceiling, or floor repair;
- (d) Reroofing;
- (e) Plumbing, electrical utility, and telephone service repair;
- (f) Routine replacement of high-efficiency particulate air filters; (g) Inspection and/or treatment of currently installed utility poles;
- (h) Repair of road embankments;
- (i) Repair or replacement of fire protection sprinkler systems;
- (j) Road and parking area resurfacing, including construction of temporary access to facilitate resurfacing;
- (k) Erosion control and soil stabilization measures (such as reseeding and revegetation);
- (l) Surveillance and maintenance of surplus facilities in accordance with DOE Order 5820.2, "Radioactive Waste Management";
- (m) Repair and maintenance of transmission facilities, including replacement of conductors of the same nominal voltage, poles, circuit breakers, transformers, capacitors, cross arms, insulators, and downed transmission lines, in accordance, where appropriate, with 40 CFR part 761 (Polychlorinated Biphenyls Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions);
- (n) Routine testing and calibration of facility components, subsystems, or portable equipment (including but not limited to, control valves, in-core monitoring devices, transformers, capacitors, monitoring wells, lysimeters, weather stations, and flumes); and
- (o) Routine decontamination of the surfaces of equipment, rooms, hot cells, or other interior surfaces of buildings (by such activities as wiping with rags, using strippable latex, and minor vacuuming), including removal of contaminated intact equipment and other materials (other than spent nuclear fuel or special nuclear material in nuclear reactors)."

Based on the DOE CX, routine maintenance activities, therefore, fall into four general categories:

Maintenance	Corrective (that is, repair), preventive, and predictive maintenance required to maintain buildings, structures, infrastructures, and equipment in a condition suitable for a facility to be used for its designated purpose.
Custodial Services	Activities to preserve facility appearance, working conditions, and sanitation (e.g., cleaning, window washing, lawn mowing, trash collection, painting, and snow removal)
Replacement In-Kind	A one-for-one change-out, repair or replacement that is in kind and is not a substantial upgrade or improvement. In kind replacement includes installation of new components to replace outmoded components if the replacement does not result in a significant change in the expected useful life, design capacity, or function of the facility.
Minor Modifications	Changes that are made to preserve buildings, structures, infrastructures, and equipment in a condition suitable for a facility to be used for its designated purpose. Such modifications include, but are not limited to, the institution of administrative and engineering controls to meet building and safety codes, to resolve

Attachment to Environmental Checklist 2000-01
Site-wide Routine Maintenance Activities

ALARA (as low as reasonably achievable) concerns, and to maintain safe and efficient working conditions (e.g., installation of lighting, safety signage, non-slip surfacing, and weather-protection enclosures or canopies).

In accordance with the limitations on routine maintenance imposed by 10 CFR § 1021, none of the activities addressed in this environmental checklist would be performed as:

- Part of, or in support of, a larger project that requires either an Environmental Assessment (EA) or an Environmental Impact Statement (EIS);
- Actions that would change the scope or mission of a facility;
- Actions that would cause a significant increase in environmental impacts of a facility;
- Actions that would affect any sensitive area or natural resources; or
- A substantial upgrade or improvement that would significantly extend the useful life of a facility.

Description of Proposed General Maintenance Activities and Processes

The following lists provide examples of the areas, facilities, processes, systems and types of equipment that routinely require maintenance at the WVDP. The lists include all the activities that are foreseeably necessary to accomplish a particular maintenance action, custodial service, replacement in-kind, or minor modification (e.g., the excavation that is necessary to access an underground utility line that requires repair). Notwithstanding, the lists are not all inclusive.

Areas Requiring Maintenance

The facilities, processes and/or systems requiring maintenance include, but are not limited to, the following:

Acid Handling Systems
Animal Control Procedures

Areas Requiring Maintenance (cont'd)

Blueprint Facilities
Cargo Trailers
Cement Solidification System (CSS)
Chemical Bulk Storage
Chemical Process Cell-Waste Storage Area (CPC-WSA)
Cold Chemical Facility
Communication Systems
Computer Systems
Cooling, Utility, Demineralized and Potable Water Systems
Condensate Recovery System
Construction and Demolition Debris Landfill (CDDL)
Contact Size-Reduction Facility (CSRF)
Container Sorting and Packaging Facility (CSPF)
Contamination Monitors
Counting Room Facilities
Crane Rooms and Associated Enclosures
Electrical Distribution Facilities
Environmental Monitoring and Surveillance
Equalization Basin

Attachment to Environmental Checklist 2000-01
Site-wide Routine Maintenance Activities

Fabrication Support Shop
Fire Protection and Detection Systems
Fire Pump House/Stations
Fuel Receiving and Storage (FRS) Area
Guardhouses
Groundwater and Seep Monitoring
Hardstands
Hazardous Waste Storage
Head-End Cells
High-Level Liquid Waste Storage
High-Level Waste Interim Storage
Hydrogen-Peroxide Addition System
Integrated Radwaste Treatment System (IRTS)
Interim Waste Storage Facility (IWSF)
Laboratories (Analytical, Process, and Environmental)
Lag Storage Building
Lag Storage Areas 1, 3, 4, and Depot
Lagoons
Laundry Facilities
Lay-Down Areas
Liquid Waste Treatment System (LWTS)
Low-Level Waste Treatment Facilities (02 Plant and LLW2) and all Lagoons
Waste Storage [Low-Level Radioactive Waste (LLW), Mixed LLW, Transuranic (TRU), Greater-Than-Class C (GTCC)]
LWTS Product Storage
Main Plant
Maintenance Shops
Mercury Abatement System
Meteorological Monitoring
NDA Interceptor Trench and Water System, Liquid Pretreatment System
North Plateau Pump-and-Treat System
Nuclear Regulatory Commission (NRC) Disposal Area (NDA)
Office Buildings, Trailers, and Speed Spaces
Permeable Treatment Wall
Petroleum Bulk Storage
Plant Utilities (Air, Electrical, Gas, Water)
Process Building
Process Waste Handling
Railroad Spur
Radwaste Treatment System (RTS) Drum Cell
RTS Drum Load-out and Transport
Restrooms and Locker Rooms
Scaled Vitrification System
Security Systems
Sewage Treatment Plant
Site Roadways, Parking Areas, Culverts, and Ditches
Size Reduction and Compactor Area
Sludge Mobilization Transfer System
Sludge Mobilization and Washing System
Solid Radioactive Waste Handling
Stormwater Management Systems
Substations
Supernatant Treatment System (STS)
Switchyards
Telecommunication Systems
Test and Storage Building

Attachment to Environmental Checklist 2000-01
Site-wide Routine Maintenance Activities

Trailers (Office, Restroom, and Storage)
Utility Room and Expansion
Ventilation Systems
Vitrification Facility
Vitrification System (Scale)
Vitrification Load-In/Load-Out Facility
Vitrification Test Facility
Warehouses (On-site and Bulk Storage)
Waste Tank Farm
Wastewater Treatment, Sewers, and Sewage Treatment
Water Reservoirs, Dams and Spillway, and Culvert
Weather Structures - Enclosures and Canopies
01-14 Building

Equipment Requiring Maintenance

Plant process equipment requiring maintenance for the areas specified above includes, but is not limited to, the following:

Air Conditioners
Air and Other Gas Compressors
Alarms
Blowers, Fans, and Ducts
Boilers
Closed-Circuit Television (CCTV) Cameras
Communication Lines and Antenna, including Towers and Satellite Dishes
Computers and Peripherals
Condensate Recovery Equipment
Contamination Monitoring Equipment
Cranes and Hoists
Dampers
Eductors
Electrical Power Generators
Equalization Basins
Evaporators
Filters and Strainers
Fire Detection and Suppression Equipment
Grinders
Heat Exchangers
Highlifts, Forklifts
Hydrants
Hydrogen-Peroxide Addition Equipment
Ion-Exchange Columns
Instrumentation and Control Systems
Jets
Laboratory Equipment
Lagoons
Laundry Equipment
Liquid Distribution Systems
Machine Shop Equipment
Machinery
Manipulators and Crane Manipulators
Material Handling Equipment
Meteorological Tower and Monitoring Equipment
Melters
Mixers/Agitators
Motors

Attachment to Environmental Checklist 2000-01
Site-wide Routine Maintenance Activities

Nox Abatement System, including Off-Gas Analyzers
Piping
Portable Ventilation Units (10)
Power Distribution Equipment
Process Heaters
Pumps (Vacuum and Pressure) and Sumps
Radiation Monitoring Equipment
Restroom Equipment (Sinks, Showers, Toilets)
Roofing
Sampling Equipment
Shield Windows/Doors
Site Characterization and Environmental Monitoring Equipment
Snowplows
Substations
Space Heaters
Switch Yards
Tanks, Process Chambers, and Vessels
Test Equipment
Transformers
Turbines and Engines
Valves
Vehicles (e.g., Earth-Moving Equipment, Trucks, Vans)
Ventilation
Waste Compactors
Welding Equipment

Maintenance Activities

- 1.0 Performance of independent verifications and inspections (both visual and remote) in support of budget and scheduling, maintenance planning, regulatory compliance, and improvement of plant safety. Verification and inspections include, but are not limited to, photography, configuration checks, robotics controlled surveillance, sample gathering, the use of mock-ups and/or test equipment.
- 2.0 Direct replacement of existing equipment and/or facility components.
- 3.0 Excavation and back-filling for the maintenance and repair of underground plant utility systems and services as well as minor extensions of existing utilities from existing plant utility systems.
- 4.0 Maintenance of plant utility systems and services, including, but not limited to:
 - water
 - electrical
 - air
 - fuel oil
 - gasoline
 - diesel
 - waste treatment and sewage
 - natural gas, nitrogen and carbon dioxide (CO₂)
 - communications and data processing
 - caustic/acid chemical addition system
 - steam
- 4.1 Maintenance of plant water systems, including, but not limited to:
 - fire pump house/station and equipment at the reservoirs

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Site-wide Routine Maintenance Activities

- cooling water
- potable water
- utility water system, steam condensate system, and treated water systems such as demineralized, distilled, and soft water
- fire protection systems, including water, dry, and other fire extinguishing equipment

4.2 Maintenance of wastewater treatment facilities/systems.

- Inspection, cleaning and repair of manholes, sewer lines, traps, treatment process tanks and chambers, and pipe clean-outs
- Maintenance and repair of the WVDP sewage treatment plant and low-level wastewater treatment facility, including, but not limited to:
 - treatment basins, vessels, tanks, chambers, and pits
 - process and effluent monitoring equipment
 - stormwater drainage systems
 - sanitary sewers
 - wastewater holding lagoons and lagoon discharge system
 - plant drainage (e.g., foundation under-drains)
 - addition of chemicals for controlling wastewater quality (e.g., pH)

4.3 Maintenance of electrical systems, including, but not limited to:

- Pump motors, manipulators, blower motors, motor starters, starter control systems, substations, and switchgear
- Electrical system component upgrades, replacement, or installation and rewiring of conduit, junction, switch and receptacle boxes; rerouting and minor additions of conduit, wire, cable, control panels, boxes and receptacles (i.e., minor additions for 480-volt system or less); placement of new wire in existing conduit; installation of conduit supports to facilitate access and maintenance
- Regular and emergency lighting
- Circuit and wiring
- Replacement of breakers, switches, disconnects, transformers, utility poles, insulators, and the replacement of downed distribution lines

4.4 Maintenance of mechanical systems, such as piping, valves, and ducts.

4.5 Maintenance of utility and instrumentation air service systems.

4.6 Maintenance of natural gas service, including, but not limited to, service lines from meters and tanks to the site equipment.

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Site-wide Routine Maintenance Activities

- 4.7 Maintenance of fuel oil service (e.g., tanks and service lines).
- 4.8 Maintenance of plant acid and chemical addition systems.
- 4.9 Maintenance of communications and data processing systems, including, but not limited to:
 - Public address systems
 - Telephone systems, including facsimile (FAX), modems, and data collection lines (e.g., meteorology system)
 - Alarm systems, including fire and radiation detection
 - Mainframe and personal computers and peripheral systems
 - Antenna, including towers and satellite dishes
 - Transmission lines, including fiber optics
- 4.10 Maintenance of process off-gas particulates and NO_x reduction, including off-gas analyzers - calibration, replacement, etc.
- 5.0 Maintenance of process instrumentation, including, but not limited to:
 - Alarm systems - electric, digital, and pneumatic instruments and systems used for controlling, recording, and alarming process variables; component replacement and repair, including, but not limited to, trouble-shooting, fitting adjustments, functionally equivalent component replacement, retubing, mounting and rewiring, testing, and calibration
- 6.0 Maintenance of heating, ventilation and air conditioning (HVAC), repair, and replacement of HVAC systems and filters including, but not limited to:
 - Office/Support Structure Spaces (HVAC)
 - Permanent Ventilation System (PVS)
 - Main Plant HVAC
 - 01-14 Building HVAC
 - Vitrification Facility System HVAC
 - Head End Ventilation System HVAC
 - Main Ventilation System
 - WTF Ventilation System
 - FRS Ventilation System
 - Portable Ventilation Units (PVUs)
 - High-Efficiency Particulate Air (HEPA) Filters
 - Installation and maintenance of HVAC when required for personnel comfort

Attachment to Environmental Checklist 2000-01
Site-wide Routine Maintenance Activities

- 7.0 Routine site and plant maintenance and custodial services (not within potential or known critical wildlife habitats or delineated wetlands, creeks, or other waters of the state) including, but not limited to:
- Grounds maintenance, such as lawn mowing, grass trimming, shrub and tree pruning
 - Application of approved pesticides and rodenticides
 - Snow shoveling, plowing, and removal
 - Grading, drainage, and culvert repairs
 - Routine revegetation and erosion control activities
 - Repair and Replacement of building and structure foundations
 - Installation of non-skid surfaces on steps, ramps, and other well-traveled areas
 - Maintenance of paved areas, including, but not limited to, parking lots, sidewalks, and roads as well as the minor addition of hard surface paving and hardstands on previously stoned areas
 - Minor extensions of existing roadways
 - Maintenance of the WVDP Rail Spur
 - Establishing storage areas for maintenance tools, equipment, and supplies
 - Janitorial, cleaning, and housekeeping activities
 - Handling, storage, and removal/disposal of recyclables, industrial, hazardous, and radioactive wastes
 - Calibration, repair, and replacement of radiation monitoring equipment, including portal monitors
 - Routine load testing of lifting equipment
 - Maintenance activities in radiologically contaminated areas, not to include decommissioning
 - Periodic routine cleaning of stormwater drainage systems (e.g., ditches, catch basins, etc.)
 - Conducting animal control procedures (e.g., trapping, relocation, sampling, etc.)
- 8.0 Buildings and structural maintenance including, but not limited to:
- Painting and coating in-door and out-door surfaces of facility equipment and other structures (e.g., walls, floors, ceilings, and decks) with paint, epoxy, and other coatings as well as surface preparations, such as cleaning, grouting, scraping, sanding, sandblasting, or other methods of surface preparation
 - Installation, repair, and replacement of exterior siding, rain-gutters, and heat tracing
 - Removal and replacement of existing roofing materials and installation of insulating materials, roofing materials, and sealants

Attachment to Environmental Checklist 2000-01
Site-wide Routine Maintenance Activities

- Repair or replacement of decks, doors, ceilings, walls, windows, floors, and floor covering
 - Removal of asbestos or asbestos-related material that can no longer be maintained in place or for which removal is necessary to support the maintenance activity
 - Minor modifications to existing structures to increase effective use of space (e.g., door, ceiling, wall, window stairs, platforms and ramp repositioning)
 - Removal and storage/disposal of obsolete or unused equipment
 - Replacement and/or relocation of existing office and cargo trailers, speed spaces, lean-tos, equipment shelters, and storage sheds
 - Dismantling of storage sheds, lean-tos, equipment shelters, trailers other similar structures, and any appurtenances attached thereto
- 9.0 Maintenance and minor modifications required to maintain security, communication, and data systems, to resolve safety concerns, and to prevent hazards, including, but not limited to:
- Maintenance of on-site and off-site communications facilities, such as antennas, radios, and monitoring and data transfer systems
 - Maintenance of detection, monitoring, surveillance, alarms, and camera systems
 - Repair of emergency equipment (e.g., generators)
 - Installation, maintenance, and repair of security fencing, gates, and lighting systems
 - Installation of protective guards on machinery
 - Addition of safety showers and eye-wash stations to existing systems whereby only minor piping changes are required
 - Fabrication, installation, and repair of steps, ramps, walk ways, safety railing, hand rails, guard rails, and frames
 - Routine decontamination and spill clean-up procedures
 - Installation and repair of fire protection systems, including, but not limited to, portable and fixed firefighting equipment as well as sprinkler systems
 - Installation and maintenance of freeze protection and related activities, including the removal of old insulation and the installation of new insulation
 - Excavations for the installation of utility systems
- 10.0 Maintenance and repair of vehicles and power equipment (excluding air conditioning and emission control systems), including, but not limited to, trucks, earth-moving equipment, mowers, forklifts, and so forth.
- 11.0 Maintenance and repair of on-site and off-site environmental monitoring equipment and stations, including but not limited to:
- Trimming trees and cutting grass around the environmental monitoring stations

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Site-wide Routine Maintenance Activities

- Repair to environmental monitoring sheds
- Placing stone, crushed gravel, etc in walkways and/or concrete pads around and under the environmental monitoring stations
- Instituting weed control measures such as adding geotextile fabric around the stations
- Upgrading electrical systems of environmental monitoring stations

PURPOSE AND NEED

The Cooperative Agreement between NYSERDA and DOE, Article IV, Section 4.08, "Operation, Maintenance and Repair," states, "The Department shall operate and maintain the Project Premises, Project Facilities and such Additional Facilities that it uses in carrying out the Project and as may be necessary or appropriate to carry out the Project in a manner which protects public health and safety and complies with the provisions of this Agreement. As used in this Section, the term 'maintain' shall include, but not be limited to, the obligation to make all necessary and appropriate repairs, changes, alterations, and additions thereto or replacements thereof, interior and exterior, structural and non-structural, ordinary and extraordinary, foreseen and unforeseen." In a similar manner, DOE Order 430.1A, "Life Cycle Asset Management," requires all DOE sites to establish procedures for maintaining physical assets "in a condition suitable for their intended use" and ensuring "physical asset availability for planned use and/or proper disposition" through "preventive, predictive, and corrective maintenance" (Attachment 2, Sections 2(b) and 2(c)).

SCHEDULE/TIMING

The routine maintenance activities evaluated in this environmental checklist would be performed on a routine and "as-needed" basis throughout calendar year (CY) 2000 and through the end of CY 2001. Maintenance activities performed by WVNS personnel would be scheduled in accordance with the WVNS Maintenance Manual (WVDP-170), Section 6.5.4, which specifies that procedures WV-108, "Preventive Maintenance Recall Tracking System and Component Information Input," and WV-109, "Instrument Calibration Recall Tracking System," be utilized to determine the frequency at which routine maintenance activities are to be performed. Procedures WV-108 and WV-109 specify that these determinations be based on manufacturer manuals, plant experience, and good engineering practices. Maintenance activities performed by subcontractor personnel would be scheduled in accordance with procedure EP-7-003, "Preparation, Review, Approval and Administration of Construction Bid Packages," Attachment C, Section 12.

SECTION B. SOURCES OF IMPACT:

1. Air Emissions - There would be minor CO and CO₂ air emissions generated from the construction equipment used to perform routine maintenance activities at the WVDP. Typically, this equipment includes trucks, excavators, paving equipment, front-end loaders, lawn maintenance, and snow removal equipment. These emissions would occur intermittently over an 8-hour day. Fugitive dust could be generated during maintenance activities. Such dust would be controlled as necessary to minimize impact.

Volatile organic compound (VOC) emissions could be generated from painting. Similarly, particulate emissions could be generated from sandblasting. Routine maintenance activities with the potential to generate either of these emissions would be evaluated on a case-by-case basis to determine regulatory requirements under the Clean Air Act, as amended.

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Site-wide Routine Maintenance Activities

The charging and recharging of air conditioning and refrigeration compressors by certified technicians would be controlled to limit gas emissions.

2. Liquid Effluents - Liquid effluents are generated from the treatment of supernatant and sludge wash solution from the HLW tank, wastewater from WVDP facilities, mixed waste from defined waste streams and sanitary and industrial wastewater, and stormwater run-off contaminated from industrial activities.

Low-level radioactive waste (LLW) is primarily generated in association with the treatment of supernatant and sludge wash solution from the HLW tank. The liquid is processed through ion-exchange columns and an evaporator and then solidified in cement. The processed waste is classified as LLW and is stored in the radwaste treatment system (RTS) drum cell.

Waste water from the plant drains, surface runoff, cooling tower blowdown, laundry, and interceptor trench water from the NRC-licensed disposal area (NDA) is treated at the existing low-level waste treatment facility (LLWTF).

These waste streams, following collection in Lagoon 2, are treated using a filtration and ion-exchange process. The effluent is released to Lagoons 4/5 for subsequent sampling and release to Lagoon 3. When discharge criteria are met, the final effluent is released from Lagoon 3 to the environment through a monitored NYS Pollutant Discharge Elimination System (SPDES) outfall.

Utility and sanitary wastewater is treated at the Wastewater Treatment Facility, which has a capacity of about 40,000 gallons/day. This activated sludge treatment process generates sludge having an excessive mass-to-food ratio. The sludge must be disposed under a permit to a publicly owned treatment works (POTW) having a State approved pretreatment program for trucked waste. Composite sampling of treated water effluent is taken prior to discharge to Erdman Brook.

3. Solid Waste - Typical construction waste such as boxes, wood forms, concrete, asphalt, wiring, piping, paper, waste materials (insulation, wood, metal) would be generated. About 7,650 m³ is currently generated annually and transported to a properly permitted solid waste landfill for disposal.

An active program to minimize waste generation is in place at the WVDP. The waste minimization program includes both source reduction and recycling. Examples include implementation of a DOE policy of double-sided copy reproduction to reduce the amount of paper used for copying, the recycling of computer printer toner cartridges as well as the reuse of styrofoam "peanuts" for packaging and shipping. Waste Minimization and Pollution Prevention Opportunities are also an integral part of the work review process. Pollution prevention opportunities are under consideration for identifying WMin/PP opportunities associated with Routine Maintenance activities.

4. Radioactive Waste/Soil - Maintenance activities performed inside contaminated areas would result in some radioactive waste. Typical types of waste would include anti-contamination clothing, rags, radiation enclosures and barriers, wood, dirt, contaminated materials and components (e.g., pumps, piping, roofing materials), decommissioning debris, contaminated HEPA filters, and contaminated absorbent used to clean up small spills. These materials would be packaged, compacted, and stored in existing on-site storage facilities pending disposal.

For excavation in an area suspected to be radioactively contaminated, WVDP Site Radiation Protection personnel would assist in developing specific work plans to minimize the potential for encountering contaminated media. The excavated soil would be screened for radioactive contamination. If contaminated water or soils were encountered, they would be characterized according to SOP 300-7, "Waste Status Determination." Any contaminated soils must be packaged in accordance with SOP 09-02, "Radioactive Waste Packaging/Repackaging," Section 5.8, "Guidelines for Packaging Excavated Contaminated Soils." The proposed excavation and

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Site-wide Routine Maintenance Activities

how it is to be completed would be designed to minimize the potential for encountering contaminated media.

In an effort to reduce the amount of LLW generated at the WVDP, segregation of clean debris from radioactively contaminated areas and debris is undertaken. Radioactively contaminated tools are kept in contaminated areas for reuse rather than disposal at the completion of the activity.

5. Hazardous Waste - Maintenance activities performed on equipment containing hazardous materials, such as acids, listed solvents, and heavy metals may require management as hazardous waste. In addition, some maintenance activities may require the use of hazardous solvents.

Activities would be planned and performed using waste minimizing strategies to limit the generation of hazardous waste. Any hazardous materials would be stored, treated, and disposed of in compliance with applicable RCRA regulations.

6. Mixed Waste - Mixed waste generated on-site from defined waste streams are stored in the interim waste storage facility (IWSF), LSA 3, LSA 4, LSB, CPC-WSA, and North FRS yard. Maintenance activities performed may generate hazardous and radioactive materials. These wastes would be managed on-site as mixed waste. Activities would be planned and performed to minimize generation of mixed waste. Mixed waste would be stored and treated in compliance with applicable state and federal regulations, DOE Orders, and legal agreements.

7. Chemical Storage/Use - Solvents and chemical cleaning agents may be used in some activities, including, but not limited to, janitorial and cleaning activities, parts cleaning, and cleaning pipes for welding.

8. Petroleum Storage - Petroleum products to support maintenance activities (i.e., gasoline or diesel-powered equipment) are stored in on-site storage tanks. These tanks are monitored and inspected in accordance with the WVDP-043, Rev. 7, "Oil, Hazardous Substances, and Hazardous Wastes Spill Prevention, Control and Countermeasures Plan." A complete list of those tanks and the associated monitoring is found in the Plan.

9. Asbestos - Some maintenance activities involve the removal of asbestos-containing materials (ACMs). The quantity of asbestos removed would be included in the Notification of Asbestos Removal submitted annually to EPA. About 600 linear feet of asbestos-containing materials is expected to be generated each year. All asbestos waste would be handled, packaged, and disposed in compliance with federal and state regulations, DOE Orders, and the WVDP Asbestos Management Plan (WVDP-072 Rev. 3, approved 06-17-93) as implemented by contractor procedures. Projects involving greater than 25 linear feet or 10 ft² of asbestos would be reviewed for State and/or Federal notification requirements. Asbestos waste would be sent to a properly permitted solid waste landfill for disposal except if radioactively contaminated, in which case would be managed as discussed above in **Section 4. Radioactive Waste/Soil**. Proposed asbestos-abatement projects that are not required for routine maintenance purposes are not covered by this Environmental Checklist/ Categorical Exclusion determination, and are required to undergo a separate NEPA review before being authorized to proceed. In such cases, Categorical Exclusion B 1.16, "Removal of Asbestos from Buildings," (10 CFR 1021, Subpart D, Appendix B) would be the appropriate CX determination.

10. Utilities - In conjunction with the use of record drawings of underground utilities within the WNYNSC, an electronic line locator would be used to locate underground utilities. These locations are then marked on the ground. Excavation by hand instead of using powered excavation equipment would take place within two feet of a known underground utility.

11. Clearing/Excavation - In order to repair or replace buried piping, wire conduit, or other system components, some excavation would be required. This excavation would be done within areas previously excavated and graded. No environmentally sensitive areas would be disturbed that would complicate or prohibit future remediation. The total amount of excavation required

Attachment to Environmental Checklist 2000-01
Site-wide Routine Maintenance Activities

would be less than 2,000 m³ per year. The repaving of existing paved areas would not cause additional ground disturbances. Less than 1,000 m² per year of asphalt paving would be applied.

12. Water Use/Diversion - Activities would be performed on water systems as necessary. These activities would not include the installation of wells or major modifications to the water supply system such as main line extensions. Approximately 500,000 gallons of treated water are used by the site each year.

13. Water Treatment - The water for the WVDP operations is piped from the WNYNSC reservoirs, treated for potability, possible drinking water use, as well as industrial, cooling and sanitary uses. See **Section 2. Liquid Effluents** for site wastewater information.

14. Waterway Modification - Waterways throughout the WNYNSC would include roadside ditches, stormwater piping, catch basins, and culverts.

Inspections during site stormwater runoff episodes and periods of snowmelt can lead to the need for minor modifications and improvements to the stormwater drainage system. This can include ditch modifications, cleaning/removal of debris, installation of culvert pipes, earthen slope maintenance and repair and improvement of soil erosion controls. The appropriate erosion controls including, but not limited to, mulch (such as straw) cover on newly seeded grassed areas would control potential soil erosion and siltation of the waterways.

Segments of the site drainage system encroach regulated wetlands and associated buffer areas. Clean Water Act permits or exemption from permitting may be required for work in these segments.

15. Radiation/Toxic Chemical Exposure - Maintenance activities would be performed in radiologically controlled areas. Although individual exposures would depend upon the duration of the activity and the proximity of the worker performing the activity to a source of radiation (e.g., waste containers, process tanks and piping), all exposures would be maintained as low as reasonably achievable (ALARA) and in compliance with applicable State and Federal regulations and DOE Orders as implemented by WVDP-010, "Radiological Controls Manual." Worker exposure is limited by guidance provided in the WVDP Radiological Controls Manual, WVDP Industrial Hygiene and Safety Manual (WVDP-011), SOP 15-14, "Entry Into and Exit From Contaminated Areas," and SOP 0-43, "Personnel Access to High and Very High Radiation Areas." The individual dose to workers would not exceed the administrative control limits of 100 mrem/day and 500 mrem/year (WVDP-010).

16. Pesticide Use - The types of pesticides and the methods of pesticide application employed at the WVDP are controlled by federal and state laws, rules, and regulations. Pesticides are applied at the WVDP in accordance with Standard Operating Procedure (SOP) 40-03, "Use of Pesticides and Herbicides." In addition, the application of rodenticide at the WVDP is performed in accordance with WV-992, "Animal Control."

"Restricted Use" and "General Use" pesticides are applied at the WVDP by certified applicators employed by a pesticide application business under subcontract to the WVDP.

Water and wastewater treatment chemicals (algicides, fungicides, and slimicides) are approved for use in the WVDP SPDES permit.

19. Noise Levels - Maintenance and repair actions, such as cutting, grinding, welding, and hammering, may result in increased noise levels near the activity. The noise levels would be of short duration and probably would not exceed 85 dB(A) TWA (decibel level measured on the A scale as a time-weighted average over an eight-hour day). Applicable federal and state regulations and DOE Orders, as implemented by the subcontractor's safety procedures, would be observed during activities expected to generate elevated noise levels.

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Site-wide Routine Maintenance Activities

20. Workforce Adjustment - Routine maintenance at the WNYNSC is typically undertaken by the WVDP workforce except in isolated cases such as the application of Restricted Use pesticides for which a Certified Applicator's license is required, or specialized skills rarely used on-site. The increase in the current workforce population would be negligible and would not encroach upon site services (e.g., parking, sewage treatment).

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Site-wide Routine Maintenance Activities

SECTION C. CATEGORY EVALUATION CRITERIA:

2. Take place in an area of previous or on-going disturbance?

The proposed action would take place in areas of previous or on-going disturbance (Figure 2).

SECTION D. RECOMMENDATION AND DETERMINATION:

A categorical exclusion (CX) is recommended for the proposed action. The routine maintenance activities described in this environmental checklist fall within the class of actions described in Title 10, Code of Federal Regulations (CFR) Part 1021, as Amended, Subpart D, Appendix B, CX 1.3, "Routine maintenance/custodial services for buildings, structures, infrastructures, equipment."

Attachment to Environmental Checklist 2000-01
Site-wide Routine Maintenance Activities

SUPPORTING DOCUMENTS

DOE and NYSERDA	"Cooperative Agreement between United States Department of Energy and New York State Energy Research and Development Authority on the Western New York Nuclear Service Center at West Valley, New York," effective October 1, 1980, as amended September 18, 1981
DOE-EIS-025	U. S. Department of Energy, "Supplement Analysis of Environmental Impacts Resulting from Modifications in the West Valley Demonstration Project," dated September 7, 1993
DOE/EIS-0081	U. S. Department of Energy, "Final Environmental Impact Statement: Long-Term Management of Liquid High-Level Radioactive Wastes Stored at the Western New York Nuclear Services Center, West Valley," dated June 1982
DOE/EIS-0226-D	U. S. Department of Energy, "Completion of the West Valley Demonstration Project and Closure or Long-Term Management of Facilities at the Western New York Nuclear Services Center," dated March 1996
DOE Order 431.1A	U. S. Department of Energy, "Life Cycle Asset Management," dated October 14, 1998
DOE Order 451.1A	U. S. Department of Energy, "National Environmental Policy Act Compliance Program," dated June 5, 1997
DOE Order 5820.2	U. S. Department of Energy, "Radioactive Waste Management," dated February 6, 1984
40 CFR §§ 1500 -1508	U. S. Council on Environmental Quality, "Council on Environmental Quality Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act," dated July 1, 1986
42 U.S.C. 4321 <i>et seq.</i>	U. S. Congress, National Environmental Policy Act, as Amended, dated January 1, 1970
OH-WVDP-98-17	West Valley Demonstration Project, "Environmental Checklist OH-WVDP-98-17, West Valley Demonstration Project (WVDP) 1999 Routine Maintenance Activities," dated February 3, 1999
Public Law 96-368	U. S. Congress, West Valley Demonstration Project Act (S.2443), dated October 1, 1980
SOP OH-6.1.01	Ohio Field Office, "National Environmental Policy Act Compliance," revision 1, dated July 7, 1995
SOP 00-12	West Valley Nuclear Services Company, "Maintenance Department - Preventive Maintenance Program," revision 4, dated August 3, 1999
SOP 00-43	West Valley Nuclear Services Company, "Personnel Access to High and Very High Radiation Areas," revision 1, dated August 27, 1998

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Site-wide Routine Maintenance Activities

SOP 15-14	West Valley Nuclear Services Company, "Entry Into and Exit From Contaminated Areas," revision 16, dated February 4, 2000
SOP 40-03	West Valley Nuclear Services Company, "Use of Pesticides and Herbicides," revision 1, dated July 23, 1996
10 CFR § 1021	U. S. Department of Energy, "National Environmental Policy Act Implementing Procedures; Final Rule," dated July 9, 1996
WV-108	West Valley Nuclear Services Company, "Preventive Maintenance Recall Tracking System and Component Information Input," revision 14, dated August 31, 1999
WV-109	West Valley Nuclear Services Company, "Instrument Calibration Recall Tracking System," revision 9, dated August 31, 1999
WVDP-EIS-025	U. S. Department of Energy, West Valley Demonstration Project, "Supplement Analysis of Environmental Impacts Resulting from Modifications in the West Valley Demonstration Project," dated September 7, 1993
WVDP-010	West Valley Demonstration Project, "Radiological Controls Manual," revision 15, dated November 5, 1999
WVDP-011	West Valley Demonstration Project, "WVDP Industrial Hygiene and Safety Manual," revision 15, dated June 25, 1999
WVDP-043	West Valley Demonstration Project, "WVDP Oil, Hazardous Substances, and Hazardous Wastes Spill Prevention, Control and Countermeasures Plan," revision 5, dated September 4, 1997
WVDP-072	West Valley Nuclear Services Company, "Asbestos Management Plan," revision 5, dated October 26, 1999
WVDP-170	West Valley Nuclear Services Company, "West Valley Nuclear Services Maintenance Manual," revision 2, dated February 10, 2000
WVDP-311	West Valley Nuclear Services Company, "Animal Control Operations," revision 0, dated July 13, 1998
WVDP-321	West Valley Demonstration Project, "Supplement Analysis II of Environmental Impacts Resulting from Modifications in the West Valley Demonstration Project," dated June 23, 1998
WVDP-336	West Valley Demonstration Project, "WVDP 1999-2001 Plan," dated October 21, 1998

**Attachment to Environmental Checklist 2000-01
Site-wide Routine Maintenance Activities**

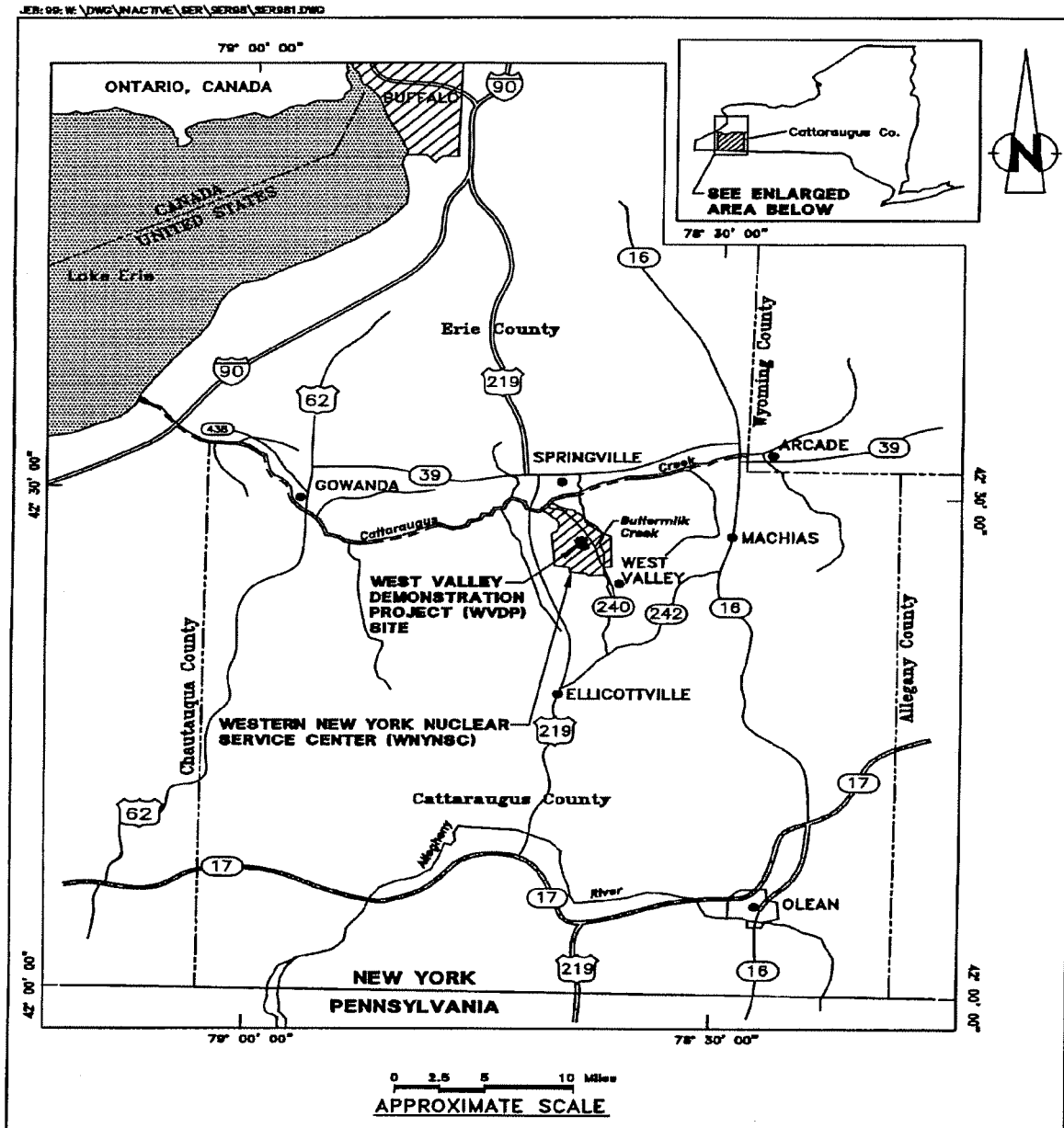


Figure 1. Western New York Nuclear Services Center (WNYNSC)

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Site-wide Routine Maintenance Activities

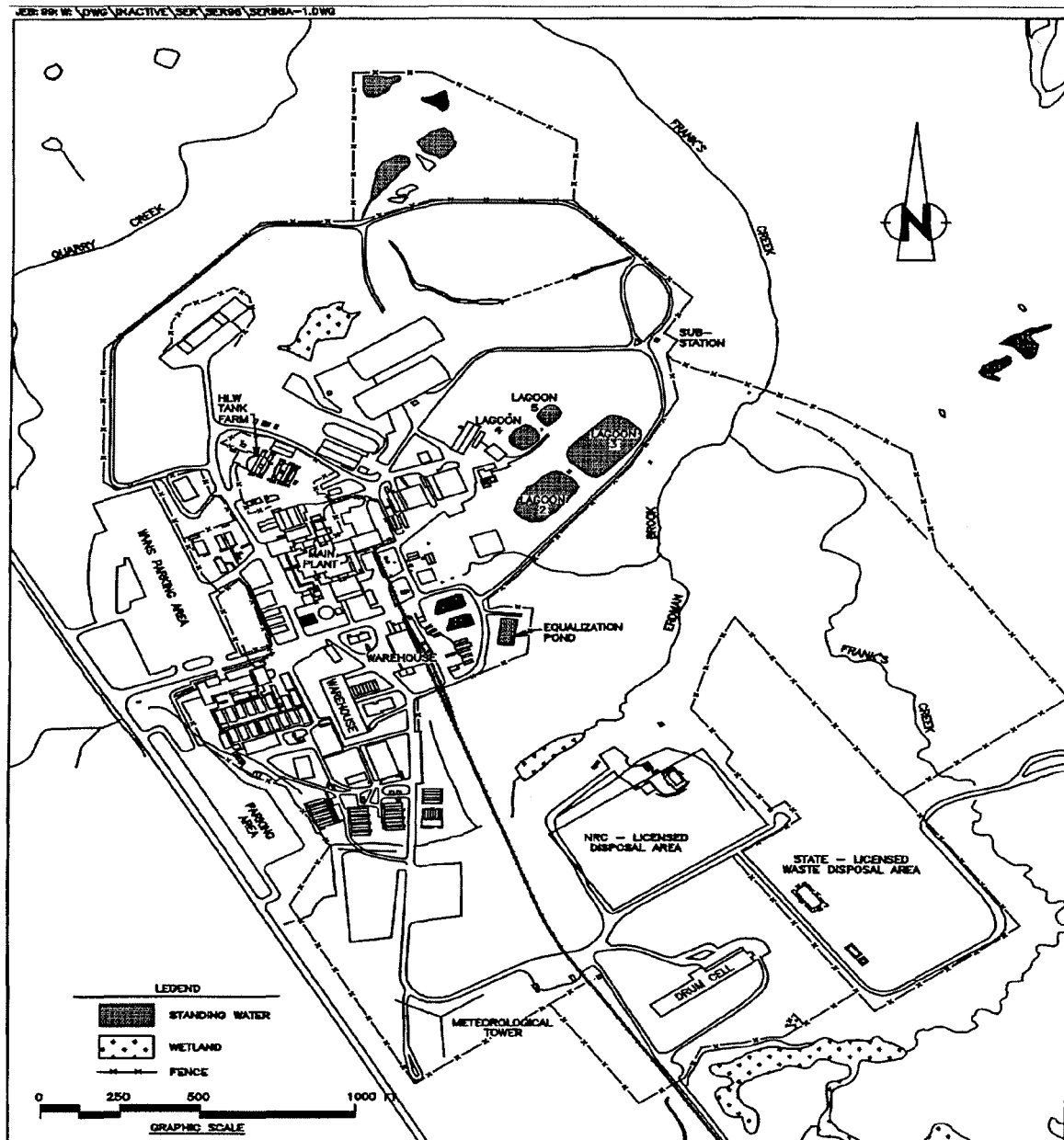


Figure 2. West Valley Demonstration Project (WVDP)

CORRESPONDENCE CONTROL SHEET
(Printed on Pink Paper)

1. CORRESPONDENCE CODE: WD : 2000 : 0499 2. DATE: 06/16/00

3. SUBJECT: Environmental Checklist OH-WVDP-2000-01, "Site-wide Routine Maintenance Activities"

4. ADDITIONAL INSTRUCTIONS AND/OR COMMENTS:

5. DOES THIS CORRESPONDENCE REQUIRE AN ACTION RESPONSE?

☒ NO

☐ YES DATE: _____ ACTION NO.: _____

6. DOES THIS CORRESPONDENCE RESPOND TO ANY DOE OR REGULATOR CORRESPONDENCE?

☒ NO

☐ YES, DOE IDENTIFICATION NUMBER: _____

COMPLETES ACTION NO.: _____

7. DOES THIS CORRESPONDENCE RESPOND TO ANY WVNS CORRESPONDENCE?

☒ NO

☐ YES, CORRESPONDENCE CODE: _____

COMPLETES ACTION NO.: _____

8. REVIEW - RESPONSE REQUIRED BY: June 20, 2000

						Concur	
<u>MS</u>	<u>Reviewer</u>	<u>Signature</u>	<u>Date</u>	<u>Concur</u>	<u>W/Comments</u>	<u>Nonconcur</u>	
AOC-24	J. J. Hoch	Signature on File in RM	06/26/2000	[]	[x]	[]	
AOC-24	J. R. Gerber	Signature on File in RM	06/26/2000	[]	[x]	[]	
_____	_____	_____	_____	[]	[]	[]	
_____	_____	_____	_____	[]	[]	[]	
_____	_____	_____	_____	[]	[]	[]	

Reviewer initial & date indicating approval from original nonconcur: _____

Initials

Date

DW:2000:0852

C. B. Banzer
J. R. Gerber

AOC-24
AOC-24